

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Rodrick Blair

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

See attached

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☒ No
(check one)

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I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Rodrick Blair</u>
Street Address	<u>1418 Flatrock Road</u>
City and County	<u>Camden Ikershaw</u>
State and Zip Code	<u>SC 29020</u>
Telephone Number	<u>803-427-8075</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Harris Teeter</u>
Job or Title (if known)	<u></u>
Street Address	<u>701 Crestdale Rd</u>
City and County	<u>Matthews, Mecklenburg</u>
State and Zip Code	<u>NC 28105</u>
Telephone Number	<u>704-844-3100</u>

Defendant No. 2

Name	<u>North Carolina Industrial Commission</u>
Job or Title (if known)	<u></u>
Street Address	<u>430 N Salisbury St</u>
City and County	<u>Raleigh, Wake</u>
State and Zip Code	<u>NC 27603</u>
Telephone Number	<u>919-807-2500</u>

Defendant No. 3

Name	<u>Ace American Insurance Company</u>
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See attached defendants

No.1 Harris Teeter

No.2 North Carolina Industrial Commission

No.3 Ace American Insurance Company

No.4 Bank of America

No.5 Wells Fargo Bank

No.6 Mehta and McConnell Injury Lawyers

No.7 Vital Vikram Mehta, My Attorney

No.8 Edward A. Sweeney, Harris Teeter Ace American Insurance Company Attorney

No.9 George Lee Martin, Attorney Mediator

No.10 Taryn Mezia, Vice president Legal compliance Harris Teeter

No.11 Terry Rogers, Transportation Manager Harris Teeter

No.12 Leigh Lockleer, Human Resource Manager Harris Teeter

No.13 Alexandra Rose Hagerty, Special Deputy Commissioner North Carolina Industrial Commission

No.14 Alexandra Saldana, Mehta and McConnell and Vital Vikram Mehta witness

No.15 Sedgwick Claims Management Services

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Rodrick Blair</u>
Street Address	<u>1418 Flatrock Road</u>
City and County	<u>Camden Kershaw</u>
State and Zip Code	<u>SC 29020</u>
Telephone Number	<u>803-427-8075</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Harris Teeter</u>
Job or Title (if known)	<u></u>
Street Address	<u>701 Crestdale Rd</u>
City and County	<u>Matthews, Mecklenburg</u>
State and Zip Code	<u>NC 28105</u>
Telephone Number	<u>704-844-3100</u>

Defendant No. 2

Name	<u>North Carolina Industrial Commission</u>
Job or Title (if known)	<u></u>
Street Address	<u>430 N Salisbury St</u>
City and County	<u>Raleigh, Wake</u>
State and Zip Code	<u>NC 27603</u>
Telephone Number	<u>919-807-2500</u>

Defendant No. 3

Name	<u>Ace American Insurance Company</u>
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B. The Defendants

No. 5 Edward A. Sweeney NCSB # 39915 Attorney for Harris Teeter, Partner Pope Ayland Sweeney and Santaniello, L.L.P., Attorneys

No. 6 Viral V. Metha NCSB # 39915 My Attorney

No. 7 Pope Ayland Sweeney and Santaniello, L.L.P., Attorneys
6701 Carmel Rd Suite #105
Charlotte, Mecklenburg
NC 28226 Phone 704-374-1600 Fax 704-759-8966

No. 8 Lee Martin Attorney Mediator
400 McGill Ave NW Suite 60
Concord
NC 28027 704-788-9700

No. 9 Sedgwick Claims Management Services
P.O. Box 14436
Lexington, Fayette
KY 40512 Phone ^{or 901-415-7400} 704-423-6200 Fax 704-423-6210

No. 10 Bank of America
620 S Tryon St.
Charlotte, Mecklenburg
NC 28202 Phone 800-432-1002

No. 11 Wells Fargo Bank
420 Montgomery St.
San Francisco, San Francisco
CA 94111 Phone 800-441-4932

No. 12 Taryn Mecia, Vice President Legal Compliance
Harris Teeter

No. 13 Terry Rogers, Transportation Manager
Harris Teeter

No. 14 Leigh Lockleer, Human Resource Manager
Harris Teeter

No. 15 Alexandra Rose Hagerty, Special Deputy Commissioner
North Carolina Industrial Commission

No. 16 Alexandra Saldona, Metha and McConnell and
Viral Vileeram Metha witness

Job or Title _____
 (if known) _____
 Street Address 436 Walnut St P.O. Box 1000
 City and County Philadelphia, Philadelphia
 State and Zip Code PA 19106
 Telephone Number 215-640-1000

Defendant No. 4

Name Metha and McConnell Injury Lawyers
 Job or Title _____
 (if known) _____
 Street Address 1900 or Suite # 110
2201 South Blvd # 410
 City and County Charlotte, Mecklenburg
 State and Zip Code NC 28203
 Telephone Number 980-292-3753 or 980-399-5638
980-326-2270 or 980-326-2275

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Rodrick Blair, is a citizen of the State of (name) South Carolina.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

\$300,000 amount (Max) EEOC would have
rewarded me based on size of Harris teeter (500 or more)
if defendants had not use fraud to deceive me of my rights
to sue

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1. Defendant committed wire and Mail fraud in my workman comp
contract and settlement deceiving me of right to sue

2. Breach of contract, my workman comp injury at mediation
had nothing to do with a Labor issue or sign release

agreement on Jan. 4 and Jan. 13, 2022 on zoom in Charlotte, NC
area, NC industrial Commission had no jurisdiction over a labor
issue (They colluded and members of the NC Bar)

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

1. \$ Two million Seven hundred thousand dollars actual damages
for fraud committed by defendants

2. Punitive Damages \$ Eight Million One hundred thousand dollars
All defendants participated in this fraud to cover up for Harris
Teeter who terminated me on 7-22-2021 at or around 1:30 PM
Over the phone

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: May. 20, 2024

Signature of Plaintiff

Rodri c le Blair

Printed Name of Plaintiff

Rodri c le Blair

B. For Attorneys

Date of signing: _____, 20____.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address